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April 4, 2023

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: *United States v. Thomas Poli*
22 Cr. 212-6 (JGK)

Dear Judge Koeltl:

*Application granted
subject to the agreed-upon
conditions listed in this letter
so ordered.*
4/4/23 *JG Koeltl*
U.S.D.S.

I represent the defendant Thomas Poli in the above-referenced matter. The defense writes to respectfully request that the Court modify the conditions of release to allow Mr. Poli to travel to Fairfield, Connecticut from Friday, April 7, 2023 at noon and return to New York on Monday, April 10, 2023 at noon so that he can spend Easter with his girlfriend at a location known to the Government and Pretrial Services. On April 26, 2022, Mr. Poli was released after his arraignment and the following conditions were imposed: \$250,000.00 personal recognizance bond cosigned by two financially responsible persons; travel restricted to the Southern and Eastern Districts of New York; surrender travel documents with no new applications; Pretrial supervision with home detention and location monitoring. In addition, Mr. Poli was ordered to have no direct or indirect contact with certain persons unless pre-approved by the government.

Pretrial Services takes no position as to the request to modify the conditions of release and reports that Mr. Poli has complied with the conditions of release imposed at his arraignment. The Government consents to the request so long as Mr. Poli travels directly from his home to the home of his girlfriend and returns directly to his home; he remains only with his girlfriend and her child (any other visitors must be pre-approved); he remains at the address in Fairfield, Connecticut or in close vicinity and obtains pre-approval from Pretrial Services for any locations that he wishes to visit while in Fairfield, Connecticut; and he continues to comply with all of the other conditions of his release. The defendant has indicated that he will comply with all the conditions sought by the Government if the Court grants his request to modify the conditions of his release.

Very truly yours,

/s/

Calvin H. Scholar

CHS/jb

cc: United States Attorney for the
Southern District of New York via ECF